



Superfund

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Hamera det.

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DUDD

MEMORANDUM

SUBJECT: Request for Removal Action for Certainiteed - Maline Creek
Asbestos Site, St. Louis Missouri.
ACTION MEMORANDUM

FROM: Donald F. Hamera
FIRE/EP&R/ENSV

TO: Morris Kay
Regional Administrator

THRU: Billy J. Fairless, Director
ENSV

same site is
covered by both
Certainiteed & GAF's
properties. Why limit
to just Certainiteed.

CERCLIS ID#:
SITE ID:

CATEGORY OF REMOVAL: ~~This is a~~ time-critical removal.
The proposed actions will mitigate a public health threat
from actual and potential exposure to transite pipe,
sheeting material and insulation which contains asbestos.

NATIONALLY SIGNIFICANT: YES

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action described herein for the Certainiteed- Maline Creek Site, St. Louis Missouri. This action will mitigate public health threats posed by potential exposure to asbestos laden materials located at this site. This is a nationally significant site.

II. SITE CONDITIONS AND BACKGROUND

A. SITE DESCRIPTION

1. Removal Site Evaluation

The Certainiteed and GAF Corporations manufactured products containing asbestos at this until manufacturing ceased in 1979. The former Certainiteed property is now owned by P.G. Investments. Branch Metal Processing, owned by P.G. Investments and Gateway Container Port, Inc presently occupy the site. Clark properties of Hazelwood, Missouri now owns the former GAF site. This property is now occupied by the New Era Group, Riverview Industrial Services, and Macmillan - Blodill Building Materials.

The Certainiteed and GAF companies had been landfilling their waste materials in a common area (approximatly 7 acres, adjacent to Maline Creek) which lies between the two plants. Also an area

I don't think this
is necessary. The
is adequate
finding language.

how do we know
manufacturing ceased
GAF?
Did both
GAF & Certainiteed
cease operations
@ the
same
time?

Can both GAF + Certainiteed
property?

Is ACM?

the AD says "isolate asbestos contaminated material present waste files on the facility site"

in the extreme northwest corner of the Certainteed plant was used as a landfill. An Administrative Order issued by the EPA under the Clean Water Act in February of 1979, ordered the GAF corporation to close and cover this landfill. The area in the northwest corner was allowed to remain undisturbed, as the material was interspersed among trees and heavy vegetation and at that time did not pose a threat. The Administrative Order was issued to the GAF Corporation, however the Certainteed Corporation helped pay for the cost of closing the landfill. The companies hired a consulting firm to draw up closure plans to comply with Missouri Solid Waste Management Laws.

I want to get up to description of what the AD required, + what they were cited for. How did EPA have approval in writing?

How does knowledge? why did they help pay? Do we know?

The landfill was capped with soil and a grass stand established. Also rip-rapp was positioned on a portion of the Maline Creek to help stabilize the bank. Both the EPA and the MDNR inspected the landfill after the work was completed. Both agencies approved the closure actions taken at this time.

In January of 1982 the Metropolitan Sewer District (MSD) conducted a cleanup in lieu of future stream channelization improvements along a 2.5 mile stretch of Maline Creek, a portion of which passes through the Certainteed and GAF properties. MSD awarded the project to the Bennish & Bommarito Construction Company. This worked entailed cutting some trees, removing debris from the creek and hauling ACM from the northwest corner of the Certainteed property. A crane and wrecking ball were then used to smooth out the remaining ACM into the Creek Bank. This aforementioned area was previously allowed to remain undisturbed in the original closure action as it was believed that the heavy brush would abate the threat of airborne particle asbestos. Without the cover of brush and trees this area has eroded severely, thus exposing this landfilled material.

2. Physical Location

The Certainteed Maline Creek Asbestos Site is located just off 600 St. Cyr Road in the corporate limits of Riverview and Bellfontaine Neighbors in Metropolitan St. Louis Missouri. Maline Creek runs adjacent to the Certainteed/GAF properties and empties into the Mississippi River approximately 1/2 mile downstream. Approximately 150-200 people live in a residential neighborhood located just west of the site. Also a nursing home is located approximately 350 ft. to the northwest.

3. Site Characteristics

The former Certainteed and GAF facilities comprise numerous manufacturing buildings and a common landfill (approximately 7 acres) which lies in between the two plants. Also Maline Creek runs adjacent to the facilities and separates the housing subdivision from the landfilled asbestos. There is an estimated 1000 sq. ft. of exposed ACM located in the northwest corner of the Certainteed site. This material wasn't included in the original closure action. Large amounts of ACM are located near and have fallen into Maline Creek. Maline Creek empties into the Mississippi River approximately 1/2 mile downstream.

Go on both GAF's + Certainteed's property?

Who estimated? EPA?

the pipe, sheeting & insul. are 15-85% asbestos?

4. Releases or threatened release into the environment of a hazardous substance, pollutant or contaminant.

Asbestos containing transite pipe, sheeting, and insulation material exist in great quantity in and around the Maline Creek. Test results confirm that Chrysotile and Crocidolite asbestos are located on site in concentrations ranging from 15% to 85%. There is friable and potentially friable asbestos material on site could potentially migrate to nearby populations. Approximately 1000 sq. ft. of ACM is exposed near the Maline Creek bank. There are approximately 150-200 people who live just west of the site. The backyards of many of this residents border Maline Creek.

Friable Asbestos has been identified on site and is a hazardous substance as defined by Section 101(14) of CERCLA and listed in the table of 40 CFR Section 302.4 (List of Hazardous Substances and Reportable Quantities). Also the potential exists for more of the material to become friable as the weathering process takes its toll on the transite pipe and sheeting material.

5. NPL Status

This site is not on, nor has it been proposed for, the National Priorities List.

B. Other Actions to Date.

1. Previous Actions

As stated earlier the MSD conducted a stream cleanup in the northwest corner of the Certainteed property in January of 1982. The MSD conducted a cleanup on a 2.5 mile stretch of the Maline Creek which included the Certainteed/GAF property. The construction company which was awarded the contract, Bennish & Bommarito, spent 2 weeks hauling away ACM from this area. Because of the large amount of ACM in this area, the construction company decided to use a wrecking ball to incorporate the rest of the ACM into the bank of Maline Creek to smooth out the channel. From file information this cleanup project is the last known work at this site, other than the original closure action completed in the Spring of 1980. There have been numerous investigations by both State and Federal officials, some of which have been in response to citizen complaints about the site.

2. Current Actions

The proposed removal action will protect the public health by ~~removing the friable asbestos material and other asbestos material located on site.~~

*do we envision removal of all ACM? or
removal of some w/ capping the rest?*

C. STATE AND LOCAL AUTHORITIES' ROLE

1. State and Local Actions to date.

The MDNR oversaw and inspected the original closure project. MDNR has also performed periodic inspections since the closure action.

2. Potential for Continued State/local response

????????????????? Many questions here. If this project is carried out who will be responsible for maintenance? How can this be handled?

should be provided by the responsible parties.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. THREATS TO PUBLIC HEALTH OR WELFARE

The potential release of airborne, friable asbestos threatens the nearby residents and industrial employees. As the transite pipe and other asbestos containing materials continue to weather and break down, asbestos fibers may become airborne and pose an inhalation threat to nearby populations. The transite pipe and other asbestos materials are located just 120 - 150 ft from nearby subdivision residents. From the Oil and Hazardous Material/Technical Assistance Data System (OHM/TADS), the chronic health risk from long term continued inhalation of asbestos dust results in asbestosis, a form of pneumocoiosis. The primary effect of inhalation is an interstitial pulmonary fibrosis. Asbestosis can increase the risk of lung cancer.

asbestosis?

(I thought that chrysotile asbestos was a known human carcinogen through inhalation)

B. THREATS TO THE ENVIRONMENT

both Asbestos fibers could affect the aquatic populations in the ~~the~~ Maline Creek and the Mississippi River. Asbestos fibers have been known to travel 75 miles from their point of release. See Attachment ().

Also produces mesotheliomas & lung carcinomas (see S&H)

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances, pollutants or contaminants from this site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to the public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. PROPOSED ACTIONS DAVE you can disregard from here on down (* Except ARARS Section) as this will change drasically when Tapan study is complete.

1. Proposed Action Description

The proposed action involves the removal and proper disposal of the asbestos material which is exposed around Maline Creek. The asbestos material will be will be disposed of in accordance with all State and Local Regulations. The exposed asbestos transite pipe and other material will be removed and the Maline Creek bank will be stabilized utilizing a proper engineering design.

2. Contribution to Remedial Performance

This action is expected to complete the response at this site. Operation and Maintenance of any bank stabilization structures will be the responsibility of the ?. No other remedial action is expected on this site.

3. Description of alternative technologies

The transportation and disposal of the asbestos waste is the standard procedure. A proper engineering design will be utilized to construct the appropriate bank stabilization structure to ensure the stabilization of Maline Creek. No other technology is considered feasible or relevant.

4. Applicable or relevant and appropriate requirements

This removal action will be conducted to eliminate the threat or potential threat of a hazardous substance, pollutant or contaminant pursuant to CERCLA, 42 U.S.C. § 9601 et seq., and in a manner consistent with the National Contingency Plan, 40 CFR Part 300, as required at 33 U.S.C. § 1321(c)(2) and 42 U.S.C. § 9605.

We don't need to include all of this, all we need to do is identify the laws

As per ~~CER~~ ^{Section} 300.415(i) ^{of the NCP}, fund financed removal actions under CERCLA Section 104 and removal actions pursuant to CERCLA Sections 106 shall, to the extent practicable, considering the exigencies of the situation, attain the applicable or relevant and appropriate requirements under Federal Environmental Law, including but not limited to, the Safe Drinking Water Act (SDWA), 42 U.S.C. 300 et seq., the Clean Air Act (CAA), 42 U.S.C. 1251 et seq., the Resource Conservation and Recovery Act, 42 U.S.C. 6901 et. seq., or any promulgated standard, applicable or relevant and appropriate requirements, criteria, or limitation under a State Environmental or facility siting law that is more stringent than any Federal standard, requirement, criteria, or limitation contained in a program approved, authorized or delegated by the Administrator and identified to the President by the State.

• Federal Laws: 40 CFR, Parts 260-284; and 40 CFR § 61.154.

• State Laws: [does Mo. have any laws re removal + disposal of asbestos?]

5. Project Schedule

The arrangements for removal and disposal of the asbestos containing material as well as the design and construction of the stabilization structure can begin after approval of this Action Memorandum.

B. Estimated Costs

Extramural Costs

ERCS.....200000

TAT.....50000

CONSTRUCTION.....300000

Subtotal, Extramural Costs.....550000

Extramural Costs Contingency
(20%).....110000

Total, Extramural Costs.....660000

Intramural Costs

EPA Direct Costs.....30000

EPA Indirect Costs.....90000

Total, Intramural Costs.....120000

Total, Removal Project Ceiling....780000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN.

ACW If this proposed removal action is not ^{and working} taken, the asbestos containing material will continue to weather, break apart and cause a potential inhalation hazard to humans living in nearby area. Also ~~asbestos containing material~~ will continue to slough off into Maline Creek threatening the Aquatic life both in the Maline Creek and the Mississippi River. *the*

VII. OUTSTANDING POLICY ISSUES

This site is nationally significant because it deals with asbestos. No national clean-up standard has been established for asbestos and any removal action requires concurrence from headquarters.

Do we know that aquatic life is threatened by asbestos?

VIII. ENFORCEMENT

A PRP search will be initiated to gather evidence from the site in order to identify ~~generator~~ PRP's.

IX. Recommendation

This decision document represents the selected removal action for the ~~certainteed~~ Maline Creek Site in St. Louis Missouri, developed in accordance with CERCLA, ~~as amended~~, and not inconsistent with the NCP. This decision is based on the administrative record for the site. Conditions at the site meet the NCP section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action. The total project ceiling, if approved, will be \$780,000. Of this, an estimated 660,000 comes from the Regional removal allowance.